

APPENDIX B*

SUGGESTED FORMAT AND SAMPLE FOR COMMUNITY RELATIONS PLAN

B-1. SUGGESTED FORMAT

a. Overview of Community Relations Plan

Purpose: Provide a general introduction by briefly stating the purpose of the Community Relations Plan and the distinctive or central features of the community relations program planned for this specific site. Note any special circumstances that the plan has been designed to address. Do not repeat general program goals (e.g., "Keep the community informed").

Length: One paragraph to several pages.

b. Capsule Site Description

Purpose: Provide the historical, geographical, and technical details necessary to show why the site was put on the NPL.

Suggested topics-

- Site location and proximity to other landmarks;
- History of site use and ownership;
- Date and type of release;
- Nature of threat to public health and environment and
- Responsibility for site (e.g., State- or Federal-lead).

Length: One page.

c. Community Background

Purpose: Describe the community and its involvement with the site. Cover three topics:

- (1) Community Profile: the economic and political structure of the community, and key community issues and interests.
- (2) Chronology of Community Involvement: how the community has reacted to the site in the past, actions taken by citizens, and attitudes toward government roles and responsibilities. Discuss actions taken by any government agencies or government officials, such as public meetings or news releases.

* This appendix provides information originally published as appendix B of EPA Directive 9230.0-03C, Community Relations in Superfund: A Handbook, January 1992.

(3) Key Community Concerns: how the community regards the risks posed by the site or the remedial process used to address those risks. One approach: break down the analysis by community group or segment (e.g., public environmental interest groups; nearby residents; and elected officials).

In all three sections, but particularly in the last, focus on the community's perceptions of the events and problems at the site rather than the technical history of the site.

Length: From three to seven pages, depending on the history and level of community involvement in the site.

d. Highlights of Program

Purpose: Provide concrete details on community relations approaches to be taken. This should follow directly and logically from the discussion in Section C of the community and its perceptions of the problems posed by the site. Do not restate the goals or objectives of conducting community relations at Superfund sites. Instead, develop a strategy for communicating with a specific community.

Suggested

- Resources to be used in the community relations program (e.g., local organizations, meeting places);
- Key individuals or organizations that will play a role in community relations activities;
- Areas of sensitivity that must be considered in conducting community relations.

Length: One page.

e. Techniques and Timing

Purpose: State what community relations activities will be conducted at the site and specify when they will occur. Suggest additional techniques that might be used at the site as the response action proceeds, as well as when these techniques are likely to be most effective.

Length: Two to three pages. Matrix format may be suitable.

Attachments

- List of Contacts and Interested Parties¹
- Locations for Information Repository and Meetings

¹(Names and addresses of individuals should not be included in the Community Relations Plan made available in the information repository for public review. Names and addresses should, however, be compiled for a mailing list as part of the Community Relations Coordinator's files.)

B-2. SAMPLE PLAN

The following Community Relations Plan for the Sludge Pond site in Woodbury, Connecticut is intended to illustrate the suggested format and content of Community Relations Plans, as discussed in Chapter 3 of this Handbook. While the plan is based on actual community interviews conducted for a Superfund remedial site, names, locations, and technical details have been changed. The plan should be viewed as an illustration only.

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SLUDGE POND SITE, WOODBURY, CONNECTICUT

COMMUNITY RELATIONS PLAN

a. OVERVIEW OF COMMUNITY RELATIONS PLAN

This Community Relations Plan identifies issues of community concern regarding the Sludge Pond Superfund site in Woodbury, Connecticut, and outlines community relations activities to be conducted during the site remedial investigation and feasibility study (RI/FS). In general, community concern about the site is low. Having known for almost 40 years that the site was a source of contamination, residents appear more or less resigned to its presence in their community. The start of remedial activity at the site, however, is likely to reawaken the community's concern. An effective community relations program for this site should prepare for this potential revival of community interest and attempt to educate, without alarming, residents so that they can better understand the Superfund remedial process. In particular, the community relations program for Sludge Pond should enlist the support and cooperation of the town and county officials of Woodbury. These individuals have a long-standing familiarity **with** the area and its residents and hold visible positions of responsibility within the community. They should be considered as a key resource in the effort to communicate openly and effectively with the people of Woodbury.

This draft Community Relations Plan has been prepared to aid EPA in developing a community relations program tailored to the needs of the community affected by the Sludge Pond site. EPA conducts community relations activities to ensure that the local public has input to decisions about Superfund actions and is well-informed about the progress of those actions. These sections follow:

- Capsule Site Description
- Community Background
- Highlights of Program
- Techniques and Timing
- Attachments: List of Contacts and Interested Parties, and Locations for Information Repository and Public Meeting

The information in this plan is based primarily on discussions conducted in Litchfield County, Connecticut in August, 1990. Participants in these discussions included individuals from the District Health Department, officials from the Litchfield County Office of the Connecticut Department of Environmental Protection (DEP), the first selectman of Woodbury Township, a Litchfield County Commissioner, and residents of Woodbury and Watertown Townships. *The Preliminary Investigation Report/Lewis Iron Works Site* prepared by contractors to Eastern Manufacturing Co. also provided valuable information.²

²This and other technical reports (such as the RI/FS work plan) will be made available at the information repository to be established in Woodbury. These reports will give full details of the type and extent of the problems at Sludge Pond.

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The U.S. Environmental Protection Agency (EPA) Region 1 Office has lead responsibility for managing this RI/FS. The EPA Region I Office of Public Affairs will oversee all community relations activities at the site. The Office of Community Involvement in the Ground Water Quality Division at DEP will play a major role in implementing community relations activities.

b. CAPSULE SITE DESCRIPTION

The Sludge Pond site is located on a 40-acre tract of land in Litchfield County, Connecticut, one mile south of Woodbury Township on Route 6. (Exhibits I and 2 illustrate the location of the site within the State and surrounding geographical landmarks.) To the north is Tanner Lake, used for fishing and swimming. The closest residences are approximately one-quarter mile to the northwest and west across Route 6.

From 1886 to 1945, the site was used by Lewis Iron Works, a major producer of charcoal, pig iron, and organic chemicals. Liquid tar residues from chemical processing were discharged into a two-acre depression on site, giving the area its current name of "Sludge Pond." Lewis Iron Works shut down its chemical operations in early 1944 and ceased operations entirely in 1945. Among the current owners of the site property are Eastern Manufacturing Co., whose nearby plant produces automotive parts; the Wilson Lumber Co.; and the township of Woodbury, which operated an eight-acre municipal landfill adjacent to Sludge Pond from 1961 to 1969.

In the late 1940s, shortly after the closing of the Iron Works, residents as far away as three miles from the site reported that their well water had "a chemical taste and a bad odor." Samples taken by the Connecticut Geological Study in 1949 indicated that phenol had contaminated eight private wells to the west and northwest of Sludge Pond. In the 1960s, the surface sludges on site caught fire and burned out of control for several weeks.

Limited water sampling conducted since 1980 has confirmed the 1949 findings of phenol in the groundwater. In addition, DEP found evidence of heavy metals in Sludge Pond in 1980. Heavy metals, however, were not confirmed by monitoring samples taken by EPA's Field Investigation Team in 1982 or by on-site testing conducted by Eastern Manufacturing in 1983. After private wells were tested by DEP and the District Health Department in 1980, residents were told that their water was drinkable.

Sludge Pond was proposed for the National Priorities List (NPL) in December, 1982. The site has recently been designated a Fund-lead site for the RI/FS, although enforcement proceedings are underway against Eastern Manufacturing.

c. COMMUNITY BACKGROUND

(1) Community Profile

The Township of Woodbury, named for the abundance of trees in the area, developed in the 1820s as settlers journeyed to western Connecticut in search of farmland. However, because of the town's fairly remote location, industry did not begin to develop in the area until about a half-century later. In 1882, George Lewis, an area entrepreneur, erected a blast furnace to manufacture charcoals, and the Lewis Iron Works soon became the area's largest employer.

Several Woodbury residents interviewed for this plan recalled the days when their relatives or neighbors worked at the Iron Works, and old photographs of the company's vast lumber stocks and furnace can still be seen in the local library and on the walls of the town office building.

**EXHIBIT B-1: SITE LOCATION MAP, SLUDGE POND SITE
LITCHFIELD COUNTY, CONNECTICUT**

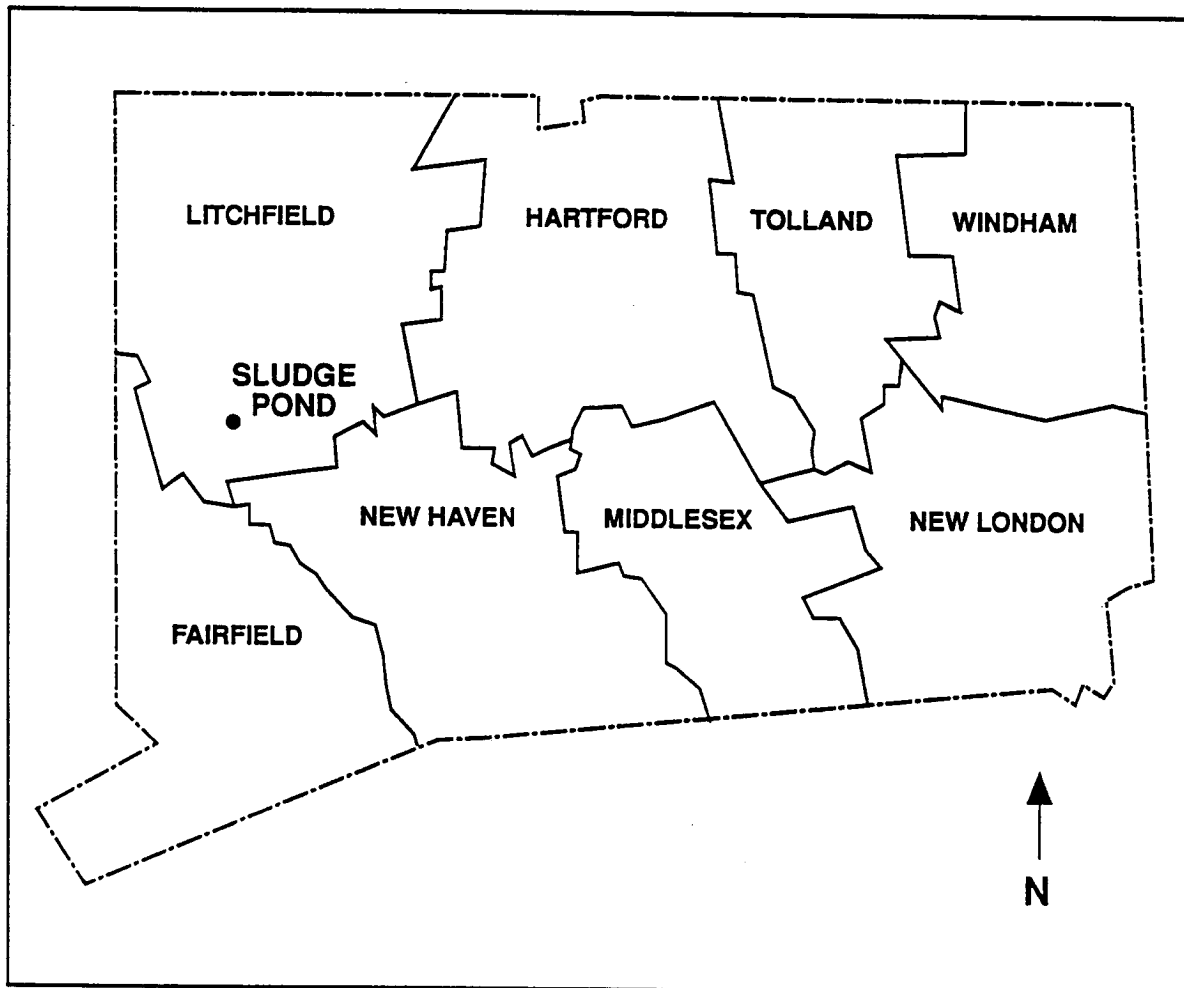
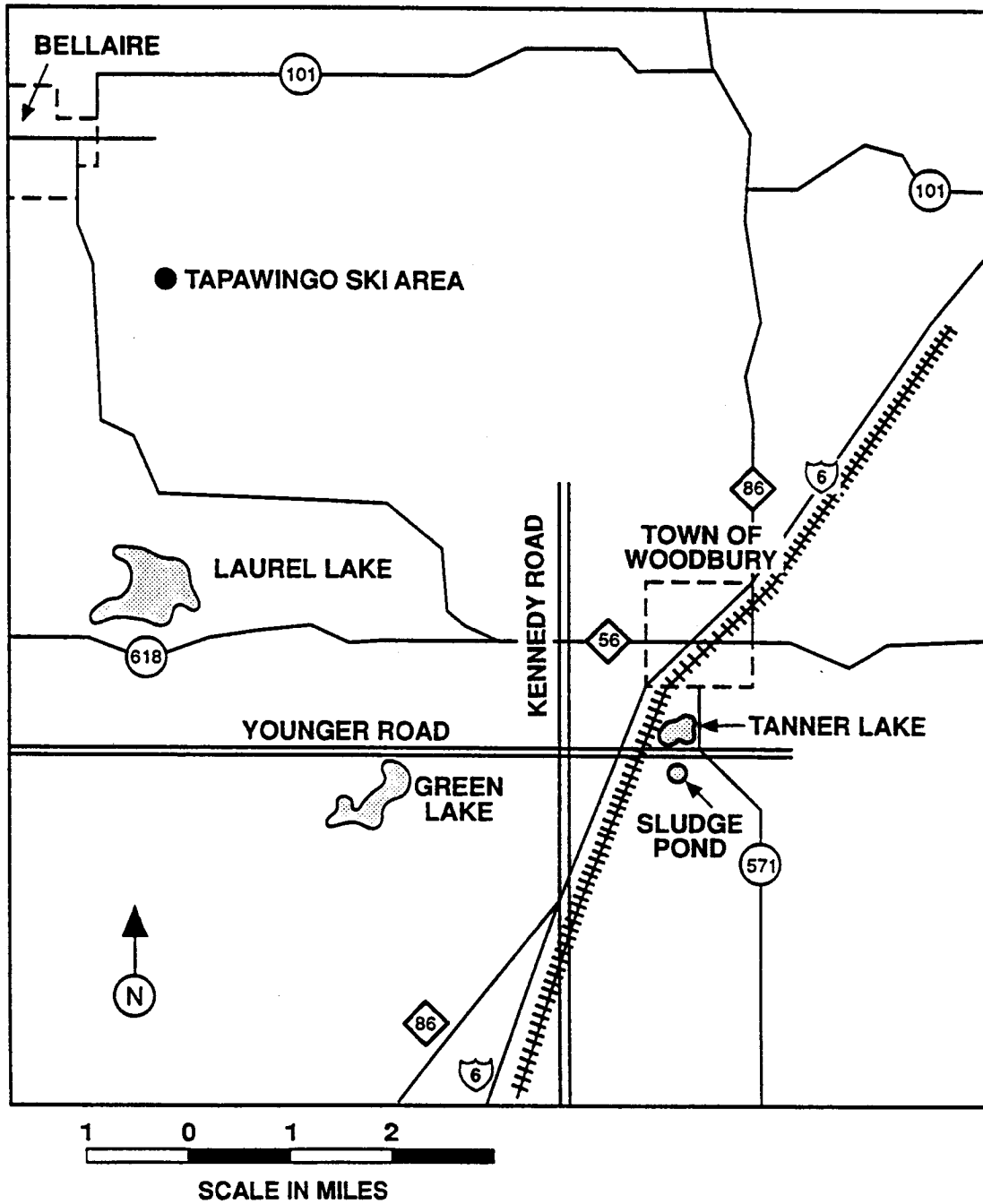


EXHIBIT B-2: SLUDGE POND SITE VICINITY MAP



Since the closing of the Iron Works, major sources of employment in the area have included light industry and fanning. Local craft industries dating from the early nineteenth century continue to flourish in the area, as do antique stores and clock shops. Dairy and poultry farms occupy a significant portion of the land in Litchfield County and nearby Hartford County.

In general, Woodbury Township remains a quiet, rural area, somewhat insulated from the industrial development to the south and east. Judging from individuals interviewed for this plan, many town members have been long-time residents in the area, and the township's small population (7,000 reported in the 1980 Census) has meant that local officials know, and are known by, most of the area's residents. A significant number of senior citizens live in the community. Aging issues and facilities for the elderly have been prominent concerns in the community, and according to the township clerk, a central meeting place in the area is the Litchfield County Senior Center.

(2) Chronology of Community Involvement

Local officials have described community reactions to the proximity of an NPL site as "quiet," particularly in the past year. The District Health Department receives only infrequent inquiries about the safety of private well water which according to users, is a brownish-orange color and stains bathroom fixtures and laundry. The last call was received at the beginning of the summer of 1985 from a prospective homebuilder who was concerned about the condition of the groundwater directly south of Sludge Pond. Because groundwater flows west from the site, and in the opinion of some local officials, is confined to a narrow finger of an aquifer, the Health Department assured the caller that his property was not threatened by contamination from the site.

The level of community concern, while never high, reached a peak in the early 1980s, when DEP analyzed sludges from Sludge Pond and water from a number of private wells. Early in 1980, a local farmer with contaminated well water wrote to the District Health Department after reading an article in the *Waterbury Republican* about the suspected hazards at the site. She was concerned because guests could not drink her water, though she herself was accustomed to its distinctive taste. When interviewed, this same resident stated that she and her husband knew about the problems with their well when they purchased their house and farm and, in fact, were able to buy the property at a reduced price because of the discolored water.

Also in 1980, the Township of Woodbury took over and began rebuilding a town water system from an independent water company. A major part of this project, which was financed through loans and grants from the Farmers' Home Administration, was the replacement of leaking wooden main pipes. Some community members also attempted to obtain a Health Department grant to have the water mains extended to the residents with private wells who had bad well water. According to a County Commissioner, obtaining funds from the Health Department for this extension required demonstrating that the water was not fit for drinking. Because this was never done, the Township was unable to finance an extended water system. While affected citizens conceivably could put in their own pipes to connect to the town water system, this option appears to be well beyond the means of individual residents.

Shortly after the site was listed on the NPL in December, 1982, the *Litchfield County Herald* ran an article identifying Sludge Pond as one of "EPA's 400 Worst." Though several residents could recall the article, the classification of Sludge Pond as a Superfund site did not particularly alarm residents or motivate them to take organized action. No community groups have been formed to participate in the investigation of the site or to voice an opinion as to how the site should or could be addressed. In general, affected residents have dealt with the problem of contaminated well water in fairly quiet and individual ways: some carry bottles of municipal water home for drinking and take extra measures (e.g., filtering and bleaching) to prevent staining of laundry. From the point of view of local officials, a far more urgent issue is the potential closure of the Litchfield-Berkshire municipal landfill after DEP found contamination in monitoring wells at the landfill. Because closure would mean that area waste would have to be transported further away, local officials are particularly concerned that some citizens will resort to dumping refuse on back roads rather than paying the higher transporting fees.

(3) Key Community Concerns

Currently, as throughout the past 10 years, community concern about contamination from Sludge Pond is fairly low, possibly because:

- Citizens have lived with the knowledge that Sludge Pond was contaminated for a long period of time.
- Citizens view the contamination primarily as a nuisance but not as a public health hazard. Residents rely on the fact that DEP and the Health Department have never declared the water undrinkable.
- Only a few residents are affected, and their houses are scattered over farmland about two miles northwest of the site. In conversations with community members, about six families were mentioned as having had problems with their private wells. At least two families have moved to homes on the municipal water supply. Another family had problems only when it installed a well before being connected to the municipal water system.

Current low level of community concern about Sludge Pond should not be construed as lack of interest. Citizens are not indifferent to the environmental problem posed by Sludge Pond; their attitude might be more accurately characterized as resigned. In their view, the problem is intractable. According to one resident, because such large quantities of sludge were once deposited on the site, it literally would take moving a small mountain to eliminate the years' accumulation of waste. Furthermore, many residents consider their community too rural and economically insignificant to command Federal attention or funds for a cleanup.

The start of the Sludge Pond RI/FS is bound to change this attitude of resignation. The arrival on site of investigation teams, as well as the discussion of alternatives during the FS, may cause people to consider that perhaps the problems at Sludge Pond can be solved and are worthy of being addressed. In developing a community relations program for this site, it is important to anticipate this potential for renewed community interest. The following kinds of concern, voiced individually and in a low-key manner during community interviews, are likely to become more visible and pressing during the RI/FS:

Property Values: Some residents have suffered losses in the market value of their property as a result of groundwater contamination in the area. When one resident put his property up for sale, he was told by the realtor that the listing had to carry a statement that his well water was contaminated. He has been unable to sell his property despite a substantial decrease in his asking price, and he has had to go into debt to purchase a new home.

Inconvenience: Contaminated well water has inconvenienced residents in a number of ways. They must carry bottled water to their homes from the homes of friends or relatives on municipal water and take extra measures with their laundry. There is also the problem of the water having a bad odor. One resident claims her plumbing has been affected by the contaminants in her water. Another resident complained of a rash that did not heal while she was using private well water, but in general, it appears that citizens regard the contamination of groundwater as a nuisance rather than a health hazard.

Follow-up with community after site work: Over the past 10 years, technical teams from EPA, DEP, the District Health Department, and Eastern Manufacturing have been in the area to sample monitoring and private wells and fence the site. Some residents complained that there was no adequate follow-up to these visits and no explanation as to the purpose or results of testing. Owners of private wells that were sampled did receive copies of laboratory slips listing the levels of various contaminants. However, they were not familiar with the types of contaminants being tested, nor did they understand how to interpret the levels detected. Local officials were also irritated that they had not been informed of the results of sampling activities.

Financing and conducting remedial work: At least one local official and one resident wondered how the investigation and possible cleanup of Sludge Pond would be financed. The official's concern was that the township could not afford remedial action at the site. At the same time, he did not consider it fair that Eastern Manufacturing, as a potentially responsible party, might be liable for remedial costs since the company had not created Sludge Pond. In general, community members do not appear to be knowledgeable about the Superfund remedial or enforcement process or its technical and legal requirements. For example, one elected official who had witnessed a technical crew on site found it difficult to understand why sampling had to be delayed until EPA-approved bottles were obtained. He was also somewhat impatient that EPA would be starting an RI of the site, when it had already been investigated a number of times.

d. HIGHLIGHTS OF PROGRAM

The community relations program at the Sludge Pond site should be designed to allow the community to learn about, and participate in, the Superfund remedial process without disrupting the community's confidence that the site poses no new or immediate hazards. To be effective, the community relations program must be gauged according to the community's need for information and its interest and willingness to participate in the remedial process.

The community relations program at the Sludge Pond site should take the following approaches:

Enlist the support and participation of local officials in coordinating community relations activities. Appropriate officials to involve in a community relations program include the Town First Selectman; the County Commissioner for Litchfield, and District Health Department officials. These officials are visible and trusted leaders in the community and are a valuable resource in EPA's effort to understand and monitor community concern. To gain the support of local officials, inform them regularly and fully of site activities, plans, findings, and developments.

Provide follow-up explanations about sampling and test results to area residents. Concise and easily-understood information should be available to all residents on the schedule of technical activities, their purpose, and their outcome. Where information cannot be released to the public, either because of quality assurance requirements or the sensitivity of enforcement proceedings, explain clearly and simply why the information must be withheld. However, community relations staff also should attempt to identify special situations or concerns where more specialized information may be required or where certain types of information are needed by single individuals or groups. In particular, owners of property where samples are taken should receive follow-up explanations of what was done and found on their land. Finally, to ensure that inquiries from the community are handled efficiently and consistently, a single EPA contact should be established for the site.

Educate area residents and local officials about the procedures, policies, and requirements of the Superfund program. To dispel some of the current confusion about EPA's purpose and responsibilities at the site, make an effort to circulate basic information to the community describing the Superfund process. Questions asked by community members during on-site discussions indicate that the following areas could receive special emphasis: scoring and ranking of NPL sites, schedule and stages of an RI/FS, and criteria used to select a cleanup alternative.

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Let the people "set the pace" for the community relations program. Be aware that Federal involvement in local issues is not always well regarded by townspeople. Federal, and even State, programs are seen as excessively bureaucratic and insensitive to the realities of local government budgets and planning. Therefore, do not "overdo" or overplan community relations activities in a way that might discourage community participation. Large, formal meetings will almost certainly be inappropriate for this community, as will activities that are planned without consulting key local officials.

e. TECHNIQUES AND TIMING

The following activities are required for the Sludge Pond site community relations program. Exhibit 3 illustrates the timing of each activity during the remedial schedule for the site.

Information Repositories/Administrative Record and Notification. Fact sheets, technical summaries, site reports (including the Community Relations Plan), and information on the Superfund program will be placed in the information repositories. An information repository will be located at the Woodbury Public Library. Details about the technical assistance grants application process will be included in the information repository. Upon commencement of remedial investigation, an administrative record file must be made available for public inspection. This file will contain information that forms the basis for the selection of a response action, including verified sampling data, quality control and quality assurance documentation, chain of custody forms, site inspection and evaluation reports, and ATSDR health assessments. It will also contain the proposed plan, as well as the Record of Decision (ROD) and supporting information. A notice of the availability of the administrative record file will be published in a major local newspaper of general circulation.

RVFS and Proposed Plan Notification and Analysis. A notice of the availability of the RI/FS and proposed plan, including a brief summary of the proposed plan, must be published in a major local newspaper of general circulation.

Public Comment Period on Draft FS Report and Proposed Plan. A minimum 30-day public comment period must be held to allow citizens to express their opinions on EPA's preferred alternative for remedial action at the Sludge Pond. Community input should be encouraged at this point by informing citizens that EPA will consider their opinions in the ultimate decision on remedial design and remedial action.

Public Meeting/Meeting Transcript. A public meeting held during the public comment period will provide an opportunity for EPA to answer questions directly and to discuss the recommended remedial alternative. According to community residents, as few as 20 or as many as 200 community residents might attend such a meeting. Therefore, planning should be flexible. This meeting might be held in the auditorium of one of Woodbury's public schools (Elementary, Middle or High School). The meeting should be coordinated with the Woodbury and Watertown Township Officers. A meeting transcript must be prepared and made available to the public.

Responsiveness Summary. This document is required as part of the ROD for the site. It should summarize public concerns and issues raised during the public comment period on the draft FS and proposed plan. In addition, the responsiveness summary should document EPA and State responses to these concerns. The ROD and responsiveness summary shall be available for public inspection and copying at or near the site prior to the commencement of remedial action. A notice of the availability of the ROD and responsiveness summary will be published in a major local newspaper of general circulation.

Revision of the CRP. This Community Relations Plan should be revised when the ROD has been issued for Sludge Pond to outline community relations activities appropriate to the remedial design and remedial action (RD/RA) phase. The revision of the CRP should:

- Update facts and verify information in the Community Relations Plan prepared for the RI/FS.
- Assess the community relations program to date and indicate if the same or different approaches will be taken during RD/RA.
- Develop a strategy to prepare the community for future roles during RD/RA and operation and maintenance.

Community interviews should be held before the Sludge Pond Community Relations Plan is revised.

Fact Sheet/Public Briefing. A detailed fact sheet describing the final engineering design must be issued, and as appropriate, a public briefing must be held prior to the initiation of remedial action.

In addition to these basic requirements for a community relations program at Sludge Pond, a number of activities will be undertaken to ensure that the community is well informed about site activities and has the opportunity to express its concerns. Activities, and their approximate timing, are as follows:

Establish an information contact: A technical or community relations staff person will be designated to respond directly to public inquiries regarding site activities. This person should coordinate with EPA Community Relations staff and the DEP Community Involvement staff in contacts with the press.

Meet with local officials and telephone them periodically: The County Commissioner and the town's First Selectman have indicated that they want to be informed about site plans and findings. Meetings with local officials should include both EPA and DEP officials and should be held at the following technical milestones:

- Completion of the final work plan;
- Completion of the draft RI/FS report; and
- Before remedial action starts.

Conduct informal meetings with residents: A meeting with residents is advisable prior to the RI and before any on-site activities involving use of earth-moving devices or other heavy machinery. The meeting should include interested citizens, the EPA Remedial Project Manager, the DEP Community Involvement Coordinator, and technical and community relations contractor assistance as necessary.

Prepare fact sheets and technical summaries: One fact sheet might be released at the beginning of the RI to inform area residents and other interested citizens about EPA's site plans and the procedures of the Superfund program. Another fact sheet (including a technical summary) might be prepared to explain the findings of the RI and to outline each of the remedial alternatives considered for the Sludge Pond site. A detailed description of EPA's preferred remedial alternative(s) should also be provided. In addition, each fact sheet should list the location of information repositories where information is available for public review.

Provide news releases to local media: Prepared statements might be released to local papers, such as the *Litchfield County Herald* and the *Waterbury Republication* and to local radio and television stations to announce discovery of any significant findings at the site during the RI/FS or to notify the community of any public meetings. Additional news releases are advisable at the following milestones:

- When the draft FS report is completed; and
- Before remedial action starts.

Addresses and phone numbers of local newspapers are included in Attachment A.

EXHIBIT B-3: TIMING

Community Relations Technique	Completion of the Work Plan	During RI	Completion of RI	During FS	Completion of Draft FS	Completion of Final FS Report	Start of Remedial Action
1) Information Repository/ Administrative Record	■			Update as needed			■
2) Naming of Information Contact	■			Update as needed			■
3) Meetings with Local Officials	■	■					■
4) Telephone Contact with Local Officials	■			Provide as needed			■
5) Informal Discussion with Residents	■	■					
6) Fact Sheets/Technical Summaries		■	■			■	
7) News Releases	■			Provide as Needed	■	■	■
8) 30-Day Public Comment Period						■	■
9) Public Meeting/Transcript						■	
10) Responsiveness Summary							■
11) Revision of CRP							■
12) Fact Sheet/Public Briefing							■

ATTACHMENT A
LIST OF CONTACTS AND INTERESTED PARTIES

A. Federal Elected Officials

(names and addresses) (phone)

B. State Elected Officials

(names and addresses) (phone)

C. Local Officials

(names and addresses) (phone)

D. U.S. EPA Region I Officials

(names and addresses) (phone)

E. State and Local Agencies

(names and addresses) (phone)

F. Community Organizations, Environmental Groups, and Citizens' Groups³

(names and addresses) (phone)

G. Media

(name and addresses) (phone)

³ Names and addresses of private citizens should not appear in the Community Relations Plan that is released to the public. However, these names should be placed on a mailing list that is compiled for the site. To protect the privacy of individuals, this mailing list is compiled for the sole use of the lead agency. However, where a federal facility is the lead agency, EPA may wish to see the mailing list

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ATTACHMENT B

**LOCATIONS FOR INFORMATION
REPOSITORY AND PUBLIC MEETING**

Information Repository:

Woodbury Public Library (203) 246-4567
202 W. State Street
Woodbury, Connecticut 06798

Hours:

Mon-Fri: 9:00 am to 9:00 pm
Sat: 9:00 am to 5:00 pm
Sun: 12:00 noon to 5:00 pm

Meeting:

Woodbury Public Schools (203) 246-1234
Elementary School
231 Chapel Street
Woodbury, Connecticut 06798

Middle School (203) 246-2468
105 E. Main Street
Woodbury, Connecticut 06798

High School (203) 246-1359
414 W. Main Street
Woodbury, Connecticut 06798

Woodbury Township Office (203) 246-4568
(basement of Woodbury Public Library)
202 W. State Street
Woodbury, Connecticut 06798